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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 REAL PROPERTY LOCATED AT 6212
NORTH POINT WAY, SACRAMENTO,
15 CALIFORNIA, SACRAMENTO COUNTY,
APN: 030-0840-045-0000, INCLUDING ALL
16 APPURTENANCES AND IMPROVEMENTS
THERETO,

17 2022 MERCEDES BENZ GLE350, VIN:
4JGFB4KE4NA626006, CALIFORNIA
LICENCE NUMBER 8ZDG249, AND

18 2022 MERCEDES BENZ AMG EQS V4, VIN:
W1KCG5FB9NA009950, CALIFORNIA
LICENCE NUMBER 9BRE850,

19
20 Defendants.

21 2:24-cv-00824-JAM-SCR

22 **FINAL JUDGMENT OF FORFEITURE**

23
24 Pursuant to the Request for Final Judgment of Forfeiture filed herein, the Court finds:

25 1. This is a civil action *in rem* brought by the United States for forfeiture of a real property
26 and two vehicles connected to a claim of fraud and money laundering. The three *In Rem* Defendants in
27 this action are:

28

- a. Real property located at 6212 North Point Way, Sacramento, California, Sacramento County, APN: 030-0840-045-0000, and more fully described in Exhibit A (hereafter “defendant real property”),
- b. 2022 Mercedes Benz GLE350, VIN: 4JGFB4KE4NA626006, California License Number 8ZDG249, and
- c. 2022 Mercedes Benz AMG EQS V4, VIN: W1KCG5FB9NA009950, California License Number 9BRE850 (hereafter “defendant vehicles”).

Collectively, the “defendant assets.”

2. Maria Dulce Pino Dickerson and Steven Gabriel are the record and/or registered owners of the defendant vehicles and real property.

3. A Verified Complaint for Forfeiture *In Rem* was filed on March 15, 2024 (hereafter “Complaint”). The Complaint alleged that the defendant assets are subject to forfeiture to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(A) and 981(a)(1)(C).

4. On April 26, 2024, the Clerk issued a Warrant for Arrest for the defendant vehicles, and that warrant was executed on September 20, 2024. The defendant real property was posted with a copy of the Complaint and Notice of Complaint on September 19, 2024.

5. Beginning on April 26, 2024, the United States published Notice of the Forfeiture Action on the official internet government forfeiture site www.forfeiture.gov. A Declaration of Publication was filed on June 28, 2024.

6. In addition to the public notice on the official internet government forfeiture site, www.forfeiture.gov, actual notice or attempted notice was given to the following individuals or entities:

- a. Maria Dulce P. Dickerson
- b. Lucrative Holdings LLC
- c. Hazem Barnia
- d. Allison Lending LLC
- e. Margerum & Associates
- f. City of Sacramento, Department of Utilities
- g. Steven Gabriel
- h. Mercedes-Benz Financial Services USA LLC

7. On May 29, 2024, Maria Dickerson filed Verified Answers asserting an interest in the defendant assets. Claimant Allison Lending LLC filed a Verified Claim on July 22, 2024, and an Answer to the Complaint on August 6, 2024. No other parties have filed claims or answers in this

1 matter, and the time in which any person or entity may file a claim and answer has expired.

2 8. On September 2, 2024, pursuant to a Stipulation for Final Judgment of Forfeiture,
3 claimant Maria Dulce Pino Dickerson agreed to forfeit all of her right, title, and interest in the
4 defendant assets listed above in paragraph 1 to the United States pursuant to 18 U.S.C. §§
5 981(a)(1)(A) and 981(a)(1)(C), to be disposed of according to law. That Stipulation is attached to and
6 incorporated in the Request for Final Judgment of Forfeiture as Exhibit B.

7 9. On November 14, 2024, pursuant to a Stipulation for Final Judgment of Forfeiture,
8 lienholder claimant Allison Lending LLC agreed to the entry of a Final Judgment of Forfeiture against
9 the real property located at 6212 North Point Way in Sacramento, California based upon the terms
10 listed in the Stipulation for Final Judgment of Forfeiture. That Stipulation is attached to and
11 incorporated in the Request for Final Judgment of Forfeiture as Exhibit C.

12 10. The Clerk of the Court entered a Clerk's Certificate of Entry of Default against Steven
13 Gabriel, Lucrative Holdings LLC, Hazem Barnia, and City of Sacramento Department of Utilities on
14 October 23, 2024. The Clerk of the Court entered a Clerk's Certificate of Entry of Default against
15 Margerum & Associates on October 28, 2024. Pursuant to Local Rule 540, the United States requests
16 that, as a part of this Final Judgment of Forfeiture, the Court enter a default judgment against the
17 interest, if any, of Steven Gabriel, Lucrative Holdings LLC, Hazem Barnia, City of Sacramento
18 Department of Utilities, and Margerum & Associates without further notice.

19 Based on the above findings, and the files and records of the Court, it is hereby ORDERED
20 AND ADJUDGED:

21 1. That judgment is hereby entered against claimants Maria Dulce Pino Dickerson and
22 Allison Lending LLC and all other potential claimants who have not filed claims in this action.

23 2. All right, title, and interest of Maria Dulce Pino Dickerson, Allison Lending LLC,
24 Steven Gabriel, Lucrative Holdings LLC, Hazem Barnia, City of Sacramento Department of Utilities,
25 and Margerum & Associates in the following defendant assets shall be forfeited to the United States
26 pursuant to 18 U.S.C. §§ 981(a)(1)(A) and 981(a)(1)(C), to be disposed of according to law:

27 a. Real property located at 6212 North Point Way, Sacramento, California,
28 Sacramento County, APN: 030-0840-045-0000, and more fully described in
Exhibit A,

- 1 b. 2022 Mercedes Benz GLE350, VIN: 4JGFB4KE4NA626006, California
2 License Number 8ZDG249, and
3
c. 2022 Mercedes Benz AMG EQS V4, VIN: W1KCG5FB9NA009950, California
4 License Number 9BRE850.

5 3. Upon entry of this Final Judgment of Forfeiture, the Internal Revenue Service –
6 Criminal Investigation (or a designee) shall list the defendant real property for sale. The Internal
7 Revenue Service – Criminal Investigation (“IRS”) shall have sole authority to select the means of sale,
8 including sale by internet or through a licensed real estate broker, and shall have sole authority over
9 the marketing and sale of the defendant real property.

10 4. The IRS shall have the defendant real property appraised by a licensed appraiser of its
11 choosing. The IRS and the appraiser may have access to the defendant real property and structures,
12 buildings, or storage sheds thereon upon 24 hours telephonic notice.

13 5. If necessary, the IRS, and any broker employed by the IRS, shall have the right to put a
14 “lock box” on the defendant real property to facilitate the marketing and sale of the defendant real
15 property.

16 6. The following costs, expenses, and distributions shall be paid in escrow from the gross
17 sales price in the following priority and to the extent funds are available:

- 18 a. The costs incurred by the IRS to the date of close of escrow, including the cost of
19 posting, service, advertising, and maintenance.
- 20 b. Any unpaid real property taxes, which shall be prorated as of the date of the entry
21 of the Final Judgment of Forfeiture.
- 22 c. A real estate commission not to exceed the IRS contractual brokerage fee.
- 23 d. The seller shall pay any county transfer taxes.
- 24 e. To claimant Allison Lending LLC - a sum to satisfy an indebtedness under the
25 Deed of Trust recorded on February 9, 2024, in the official records of Sacramento
26 County as Document Number 202402091221 (“Deed of Trust”). As of July 10,
27 2024, the balance owed was \$671,075.00 which includes the principal balance of
28 \$660,000.00 and accrued interest/fees of \$11,075.00. The payment will include
 all unpaid interest at the contractual rate, plus any advances and costs incurred by
 Allison Lending LLC, up to the date of the payoff of the loan, including, but not
 limited to reasonable attorney’s fees, any insurance advances, and tax advances
 on the defendant real property.
- 29 f. The costs of a lender's policy of title insurance (ALTA policy) shall be paid for by
 the buyer.

7. Each party shall execute all documents necessary to close escrow if such signatures are required by the title insurer.

8. The United States will receive the remaining net proceeds from the sale of the defendant real property forfeited under this stipulation. All right, title, and interest in said funds shall be substituted for the defendant real property and forfeited to the United States pursuant to 18 U.S.C §§ 981(a)(1)(A) and 981(a)(1)(C), to be disposed of according to law.

9. Upon entry of this Final Judgment of Forfeiture, the Internal Revenue Service – Criminal Investigation (or a designee) shall sell the defendant vehicles in the most commercially feasible manner and shall pay any legitimate liens. The United States may pay any such lien or encumbrance at its sole discretion. According to Mercedes-Benz Financial Services, the payoff amount on the defendant 2022 Mercedes Benz AMG EQS V4, VIN: W1KCG5FB9NA009950, California License Number 9BRE850 is \$64,476.09 as of November 17, 2024.

10. The United States and its servants, agents, and employees and all other public entities, their servants, agents, and employees, are released from any and all liability arising out of or in any way connected with the arrest, posting, forfeiture or sale of the defendant assets. This is a full and final release applying to all unknown and unanticipated injuries, and/or damages arising out of said arrest, posting, forfeiture or sale of the defendant assets, as well as to those now known or disclosed. The claimants waived the provisions of California Civil Code § 1542.

11. All parties are to bear their own costs and attorneys' fees, except as provided for herein. Allison Lending LLC reserves its right to add its costs and attorneys' fees incurred in this action to the loan's indebtedness for the defendant real property as called for in paragraph 9(d)(v) in the Stipulation for Final Judgment of Forfeiture attached as Exhibit C to the Request for Final Judgment of Forfeiture, and in accordance with the terms of the Deed of Trust. Allison Lending LLC further reserves its contractual right, as noted in paragraph 9(d)(v) in the Stipulation for Final Judgment of Forfeiture attached as Exhibit C to the Request for Final Judgment of Forfeiture, not to accept any proceeds from escrow for the defendant real property which are insufficient to satisfy the full amount of indebtedness owing under the Deed of Trust at that time.

12. The U.S. District Court for the Eastern District of California, Hon. John A. Mendez, District Judge, shall retain jurisdiction to enforce the terms of this Final Judgment of Forfeiture.

SO ORDERED.

Dated: November 20, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE

Exhibit A

EXHIBIT A

Real property located at 6212 North Point Way, Sacramento, California

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF SACRAMENTO, COUNTY OF SACRAMENTO, STATE OF CALIFORNIA AND IS DESCRIBED AS FOLLOWS:

LOT 3, AS SHOWN ON THE FINAL MAP OF RIVER FRONT ESTATES #2, FILED IN THE OFFICE OF THE RECORDER OF SACRAMENTO COUNTY, CALIFORNIA ON SEPTEMBER 28, 2000 IN BOOK 276 OF MAPS, AT PAGE 7.

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